

EXHIBIT A

From: Ellyn Garofalo <egarofalo@lftcllp.com>
Sent: Thursday, July 10, 2025 7:57 PM
To: Stephanie Roeser
Cc: mitra@ahouraiianlaw.com; Nathan, Aaron E; Matthew Bruno; Gottlieb, Michael; Meryl Governski; Esra Hudson; Connolly, Michaela; Katelyn Climaco; Summer Benson; Bender, Kristin; Cortni Davis; Vaneta Birtha; Jose Perez; Amir Kaltgrad; Rose Khatchikian; Bryan Freedman; Jason Sunshine; Local MS. Counsel; Local KAF. Counsel; Christina Puello; Theresa Troupson; Kim Zeldin; Nicholas Inns; Kristin Tahler; Maaren Shah
Subject: Re: Lively v. Wayfarer - Deposition Scheduling [IMAN-MATTERS.FID37300]

***** EXTERNAL EMAIL *****

Talk about posturing. In any event, we expect to see ms lively at 9 am on July 17 at [REDACTED] for her deposition.
 Sent from my iPhone

On Jul 10, 2025, at 4:46 PM, Roeser, Stephanie <SRoeser@manatt.com> wrote:

Ellyn,

If you believe “it makes sense to continue the deposition until all discovery is complete,” then you should do so. You seem to want us to weigh in on your decision, but we have no obligation to make that assessment for you – it is, after all, your deposition – you decided that Ms. Lively must be the first deponent, and you selected this date, and if you decide to move forward, that too will be your choice. And you will be held accountable for your own strategic decision in the event you later decide that it would have been advisable to have scheduled Ms. Lively’s deposition later in the discovery period. Ms. Lively will not sit for deposition a second time based on your strategic miscalculations. This is your deposition, and you have both the right and the obligation to conduct it in a manner that you understand will be consistent with the Court’s instruction that no witness in this case will be deposed more than once.

Given the limited time left before July 17, we have respectfully urged you to discontinue all posturing and gamesmanship around the scheduling of this deposition so that we can address the needs of not just our client, but numerous attorneys whose schedules are in limbo as a result of your numerous requests that we reach a mutual agreement to postpone Ms. Lively’s deposition.

At this point, however, the posturing is continuing because your email below states that you will proceed with Ms. Lively’s deposition on July 17, notwithstanding your reservations and your clear preference to move it. You have not agreed to our reasonable request to hold the deposition at [REDACTED] nor to advise us in advance who will be present at the deposition. You have provided no reason for refusing these basic courtesies, so we can only assume that it is because you intend to make a media show of Ms. Lively’s deposition in some way, both inside and outside of the deposition room. If we don’t hear otherwise from you by 12:00 p.m. PST tomorrow, July 11, we will promptly file a motion for a protective order at that time in which we will ask for the Court to order these clearly warranted parameters to the deposition. Likewise, if you later move the deposition, we will seek sanctions against

you and your clients for the costs and fees we have already incurred in preparing for the deposition on the date you have repeatedly affirmed you intend to keep.

We continue to not understand why you seem to be unable to simply state, honestly and directly, that you are requesting that we reschedule Ms. [REDACTED] deposition date, and to request that we meet and confer on a mutually agreeable date to reschedule. We further do not understand why you refuse to accommodate our completely reasonable security and location requests. We remain open to such discussions if you choose to proceed in a reasonable manner. Otherwise, we'll seek relief from the Court by noon tomorrow.

Regards,

Stephanie Roeser

Partner

<image001.png>

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From: Ellyn Garofalo <egarofalo@lftcllp.com>

Sent: Thursday, July 10, 2025 5:23 PM

To: Roeser, Stephanie <SROeser@manatt.com>; mitra@ahouraianlaw.com

Cc: Nathan, Aaron E. <ANathan@willkie.com>; Bruno, Matthew <MBruno@manatt.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Hudson, Esra

<EHudson@manatt.com>; Connolly, Michaela <MConnolly@willkie.com>; Climaco, Katelyn <KClimaco@manatt.com>; Summer Benson <sbenson@lftcllp.com>; Bender, Kristin

<KBender@willkie.com>; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Amir Kaltgrad <akaltgrad@lftcllp.com>; Rose Khatchikian

<rkhatchikian@lftcllp.com>; Bryan Freedman <bfreedman@lftcllp.com>; Jason Sunshine

<jsunshine@lftcllp.com>; Local MS. Counsel <ms@msf-law.com>; Local KAF. Counsel <kaf@msf-law.com>; Christina Puello <cspuello@lftcllp.com>; Theresa Troupson <ttroupson@lftcllp.com>; Kim Zeldin <kzeldin@lftcllp.com>; Nicholas Inns <nicholasinns@quinnmanuel.com>; Kristin Tahler

<kristintahler@quinnmanuel.com>; Maaren Shah <maarenshah@quinnmanuel.com>

Subject: RE: Lively v. Wayfarer - Deposition Scheduling [IMAN-MATTERS.FID37300]

[EXTERNAL] Please do not reply, click links, or open attachments unless you recognize the source of this message and know the content is safe.

We will proceed with Blake Lively's deposition on July 17, 2025. We remain convinced that in light of the new scheduling order delaying the completion of discovery, it makes sense to continue the deposition until all discovery is complete. That way, we would avoid any

argument that Ms. Lively could not properly prepare and, most importantly, any objection or instruction not to answer based on the claim that certain documents have not yet been produced and/or there has been insufficient time for Plaintiff's counsel to review the files, particularly the film footage. In this vein, Ms. Lively has objected, among other things, that the footage produced lacks sound. We produced the raw footage in compliance with the ESI protocol. However, in order to fully cooperate with discovery, we will agree to provide footage which marries the sound to the images ***on the condition that you will agree not to argue that that in processing this footage to marry the sound and picture, the Wayfarer Parties have somehow manipulated evidence.*** We are happy to provide any information on the technical process to avoid any misunderstanding. Please let me know if you are amenable to this agreement.

In any event, since we cannot agree to continue the deposition, at Ms. Lively's insistence, we will proceed on July 17. Please feel free to call me if you have any questions or wish to further discuss this matter.

Ellyn S. Garofalo
 Liner Freedman Taitelman + Cooley, LLP
 1801 Century Park West, 5th Floor
 Los Angeles, California 90067
 Direct: (310) 201-4912
 Cell: (310) 487-3737

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From: Roeser, Stephanie <S.Roeser@manatt.com>
Sent: Thursday, July 10, 2025 12:00 PM
To: mitra@ahouraianlaw.com
Cc: Nathan, Aaron E. <ANathan@willkie.com>; Bruno, Matthew <MBruno@manatt.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Hudson, Esra <EHUDSON@manatt.com>; Connolly, Michaela <MConnolly@willkie.com>; Climaco, Katelyn <Kclimaco@manatt.com>; Summer Benson <sbenson@lftcllp.com>; Bender, Kristin <KBender@willkie.com>; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Ellyn Garofalo <egarofalo@lftcllp.com>; Amir Kaltgrad <akaltgrad@lftcllp.com>; Rose Hatchikian <rkhatchikian@lftcllp.com>; Bryan Freedman <bfreedman@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Local MS. Counsel <ms@msf-law.com>; Local KAF. Counsel <kaf@msf-law.com>; Christina Puello <cpuello@lftcllp.com>; Theresa Troupson <ttroupson@lftcllp.com>; Kim Zeldin <kzeldin@lftcllp.com>; Nicholas Inns <nicholasinns@quinnmanuel.com>; Kristin Tahler <kristintahler@quinnmanuel.com>; Maaren Shah

<maarenshah@quinnmanuel.com>

Subject: RE: Lively v. Wayfarer - Deposition Scheduling [IMAN-MATTERS.FID37300]

Mitra,

Following up on our call regarding deposition scheduling. As I mentioned, we are prepared and eager to go forward with Ms. Lively's deposition next Thursday, July 17. We therefore will not mutually agree to reschedule that date. That said, we understand that this is your deposition and, if you choose to move the date, you may do so. That decision, however, must be made and communicated to us no later than 5:00 p.m. (EST) today.

Our team fully intends to go ahead and has already incurred significant expenses to prepare for and travel to [REDACTED] for the deposition. If we do not hear from you by 5:00 EST confirming whether or not the deposition will proceed, we will seek sanctions against the Wayfarer Parties for all costs incurred to further prepare for and travel to the deposition, including, without limitation, associated attorneys' fees, costs and travel expenses.

We are otherwise available to discuss deposition scheduling for other witnesses.

Thank you,

Stephanie

Stephanie Roeser

Partner

<image001.png>

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From: Roeser, Stephanie
Sent: Thursday, July 10, 2025 9:59 AM
To: 'Kim Zeldin' <kzeldin@lftcllp.com>
Cc: 'Nathan, Aaron E.' <ANathan@willkie.com>; Bruno, Matthew <MBruno@manatt.com>; 'Gottlieb, Michael' <MGottlieb@willkie.com>; 'Meryl Governski' <mgoubernski@dirllp.com>; Hudson, Esra <EHUDSON@manatt.com>; 'Connolly, Michaela' <MConnolly@willkie.com>; Climaco, Katelyn <KCLIMACO@manatt.com>; 'Summer Benson' <sbenson@lftcllp.com>; 'Bender, Kristin' <KBENDER@willkie.com>; 'Cortni Davis' <cdavis@lftcllp.com>; 'Vaneta Birtha' <vbirtha@lftcllp.com>; 'Jose Perez' <jperez@lftcllp.com>; 'Ellyn Garofalo' <egarofalo@lftcllp.com>; 'Amir Kaltgrad' <akaltgrad@lftcllp.com>; 'Rose Khatchikian' <rkhatchikian@lftcllp.com>; 'Bryan Freedman' <bfreedman@lftcllp.com>; 'Jason Sunshine' <jsunshine@lftcllp.com>; 'Local MS. Counsel' <ms@msf-law.com>; 'Local KAF. Counsel' <kaf@msf-law.com>; 'mitra@ahouraianlaw.com' <mitra@ahouraianlaw.com>; 'Christina Puello' <cpuello@lftcllp.com>; 'Theresa Troupson' <ttrouppson@lftcllp.com>; Nicholas Inns <nicholasinns@quinnmanuel.com>; Kristin Tahler

<kristintahler@quinnemanuel.com>; Maaren Shah <maarensyah@quinnemanuel.com>

Subject: RE: Lively v. Wayfarer - Deposition Scheduling [IMAN-MATTERS.FID37300]

Counsel,

Following up on my email below. **Please confirm by 12:00 PT/3:00 ET today** whether you intend to go forward with Ms. Lively's deposition as scheduled on July 17 and whether you agree to conduct the deposition at [REDACTED] and to identify all attendees in advance (no later than tomorrow). If we do not hear from you this afternoon, we will promptly raise these issues to the Court.

Thanks,
Stephanie

Stephanie Roeser

Partner

<image001.png>

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From: Roeser, Stephanie
Sent: Tuesday, July 8, 2025 11:44 PM
To: Kim Zeldin <kzeldin@lftcllp.com>
Cc: Nathan, Aaron E. <ANathan@willkie.com>; Bruno, Matthew <MBruno@manatt.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Hudson, Esra <EHUDSON@MANATT.COM>; Connolly, Michaela <MConnolly@willkie.com>; Climaco, Katelyn <KCLIMACO@MANATT.COM>; Summer Benson <sbenson@lftcllp.com>; Bender, Kristin <KBENDER@willkie.com>; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Ellyn Garofalo <egarofalo@lftcllp.com>; Amir Kaltgrad <akaltgrad@lftcllp.com>; Rose Khatchikian <rkhatchikian@lftcllp.com>; Bryan Freedman <bfreedman@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Local MS. Counsel <ms@msf-law.com>; Local KAF. Counsel <kaf@msf-law.com>; mitra@ahouraianlaw.com; Christina Puello <cpuello@lftcllp.com>; Theresa Troupson <ttroupson@lftcllp.com>
Subject: RE: Lively v. Wayfarer - Deposition Scheduling [IMAN-MATTERS.FID37300]

Kim,

We are confused by your email. We are not requesting to postpone Ms. Lively's deposition, but instead were simply looking for your confirmation that the footage would be provided by July 11, which you have now provided.

As to Ms. Lively's deposition, we plan for that to go forward on July 17, and we have made travel plans and schedule arrangements on that understanding, both with respect to this case and other matters. We have also made preparations for the deposition to take place at [REDACTED], including extensive security measures. This approach aligns with [REDACTED]

[REDACTED] We are available to meet and confer on the location issue as needed, and otherwise are prepared for that issue to be addressed with the Court in advance of the confirmed July 17 date.

Regards,
Stephanie

Stephanie Roeser

Partner

<image001.png>

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From: Kim Zeldin <kzeldin@lftcllp.com>
Sent: Tuesday, July 8, 2025 6:53 PM
To: Roeser, Stephanie <SROeser@manatt.com>
Cc: Nathan, Aaron E. <ANathan@willkie.com>; Bruno, Matthew <MBruno@manatt.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Hudson, Esra <EHUDSON@manatt.com>; Connolly, Michaela <MConnolly@willkie.com>; Climaco, Katelyn <KCLIMACO@manatt.com>; Summer Benson <sbenson@lftcllp.com>; Bender, Kristin <KBender@willkie.com>; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Ellyn Garofalo <egarofalo@lftcllp.com>; Amir Kaltgrad <akaltgrad@lftcllp.com>; Rose Khatchikian <rkhatchikian@lftcllp.com>; Bryan Freedman <bfreedman@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Local MS. Counsel <ms@msf-law.com>; Local KAF. Counsel <kaf@msf-law.com>; mitra@ahouraianlaw.com; Christina Puello <cpuello@lftcllp.com>; Theresa Troupson <ttroupson@lftcllp.com>
Subject: RE: Lively v. Wayfarer - Deposition Scheduling [IMAN-MATTERS.FID37300]

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Counsel:

We agree to your request to postpone Ms. Lively's deposition currently scheduled for July 17, 2025. As the film footage will be produced by July 11, 2025, please provide us with several available dates in late

July for Ms. Lively's deposition. The deposition will be take place at [REDACTED] which has security, as set forth in the original deposition notice. Let us know by noon PT tomorrow the available alternative dates for Ms. Lively's deposition and whether court intervention is necessary on the location issue.

Kim S. Zeldin
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 Facsimile: (310) 201-0045
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From: Roeser, Stephanie <SROeser@manatt.com>
Sent: Monday, July 7, 2025 2:46 PM
To: Summer Benson <sbenson@lftcllp.com>; Bender, Kristin <KBender@willkie.com>; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Ellyn Garofalo <egarofalo@lftcllp.com>; Kim Zeldin <kzeldin@lftcllp.com>; Amir Kaltgrad <akaltgrad@lftcllp.com>; Rose Khatchikian <rkhatchikian@lftcllp.com>; Bryan Freedman <bfreedman@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Local MS. Counsel <ms@msf-law.com>; Local KAF. Counsel <kaf@msf-law.com>; mitra@ahouraianlaw.com; Christina Puello <cspuello@lftcllp.com>; Theresa Troupson <ttroupson@lftcllp.com>
Cc: Nathan, Aaron E. <ANathan@willkie.com>; Bruno, Matthew <MBruno@manatt.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Hudson, Esra <EHUDSON@manatt.com>; Connolly, Michaela <MConnolly@willkie.com>; Climaco, Katelyn <KClimaco@manatt.com>
Subject: Lively v. Wayfarer - Deposition Scheduling

Counsel,

We write regarding Ms. Lively's upcoming July 17 deposition. As we have emphasized in letter and email on June 11 and June 17, and during the parties' meet and confer on June 13, Ms. Lively's receipt and review of the film footage on which you may rely for her deposition is a necessary precondition to her sitting for a deposition in this matter. In fact, we agreed to a continuance of Ms. Lively's deposition from the originally noticed date of June 23 to July 17 "[o]n the understanding that **all footage to be produced in this case**, including the footage that may be used or relied on in Ms. Lively's deposition, **will be produced by July 1.**" Timely production of documents and footage is critical because, as we have repeatedly communicated, Ms. Lively will not sit for a deposition more than once.

On June 26, you estimated that you would substantially complete a production of 100 TBs of film footage data "by July 1, with the few remaining hard drives to arrive shortly thereafter next week." In response to our request for tracking numbers for the drives on July 1 (none of which we had received at the time of our email), you indicated that the majority of the drives should have arrived and that the final drives "should arrive prior to the holiday." It has been nearly a week since July 1, and four days since the July 4 holiday, but we still do not have all the film footage you intend to produce. Instead, by

July 1, you produced 14 slip sheets, allegedly corresponding to each of the hard drives had sent or intended to send, and only 3 hard drives. Just this afternoon, you advised that there has been a “processing delay,” indicating that the final three hard drives have not even been shipped. We have repeatedly stated that timely production of the film footage is a gating issue. Ms. Lively’s deposition is scheduled to take place in 10 days, and as of this writing, you have refused to provide even a tracking number for the final set of hard drives that were purportedly due to arrive *before* July 4. If you wish to proceed with Ms. Lively’s deposition on July 17, please confirm when we can expect the remaining hard drives no later than 12:00 p.m. PT tomorrow.

Assuming that all footage will in fact be delivered to us by July 11, we will go ahead with Ms. Lively’s deposition on July 17, beginning at 10:00 a.m. EST. For security reasons, Ms. Lively’s deposition will be held at [REDACTED]

Separate and private breakout spaces will be provided for attending parties and counsel, as well as lunch and refreshments. We are also happy to coordinate logistics and [REDACTED] with the court reporter and videographer if you would like. For security reasons, we will require a list of all persons who wish to attend the deposition by no later than Friday, July 11.

Thank you,
Stephanie

Stephanie Roeser

Partner

<image001.png>

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